

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN**

In re	)	
	)	Chapter 9
CITY OF DETROIT, MICHIGAN,	)	
	)	Case No. 13-53846
	)	
Debtor.	)	Hon. Steven W. Rhodes
	)	

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**NOTICE OF VIDEOTAPED DEPOSITION OF GAURAV MALHOTRA**

To: Parties on the attached **Exhibit 1** and **Exhibit 2**.

**PLEASE TAKE NOTICE** that, pursuant to Federal Rules of Civil Procedure 26 and 30, made applicable to this proceeding by Federal Rules of Bankruptcy Procedure 7026 and 7030, and the *Order Establishing Dates and Deadlines Regarding the Debtor's Motion to Assume Lease or Executory Contract* [Dkt. No. 281], Syncora Guarantee Inc. and Syncora Capital Assurance Inc. and all of the objecting parties set forth in **Exhibit 1**, attached hereto, by and through their attorneys of record, will take the deposition upon oral examination of **Gaurav Malhotra** at The Westin Book Cadillac, 1114 Washington Blvd, Conference Room: Founders AB, 3rd Floor, Detroit, Michigan 48226 on **Wednesday, August 28, 2013**, or at such other date or place to which the parties mutually agree. The deposition will begin at **1:00 p.m.**, and continue until completed. Mr. Malhotra's deposition will be taken before a court reporter or other person authorized by law to administer oaths and provide an official record of the deposition.

Mr. Malhotra's deposition will be recorded by stenograph and videotaped for the purpose of discovery, for use in the above-titled action, and for any other purpose permitted under the Federal Rules of Civil Procedure and the Federal Rules of Bankruptcy Procedure.

Dated: August 26, 2013

Respectfully submitted,

**KIRKLAND & ELLIS LLP**

By: /s/ Ryan Blaine Bennett

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*Attorneys for Syncora Guarantee Inc. and  
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## **EXHIBIT 1**

### **List of Objecting Parties**

<b>Objecting Party</b>	<b>Counsel for Objection Party</b>
<i>Syncora Guarantee Inc. and Syncora Capital Assurance Inc.</i>	James H.M. Sprayregen, P.C. Ryan Blaine Bennett Stephen C. Hackney KIRKLAND & ELLIS LLP 300 North LaSalle Chicago, Illinois 60654 Telephone: (312) 862-2000 Facsimile: (312) 862-2200 - and - Stephen M. Gross David A. Agay Joshua Gadharf MCDONALD HOPKINS PLC 39533 Woodward Avenue Bloomfield Hills, MI 48304 Telephone: (248) 646-5070 Facsimile: (248) 646-5075
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**Certificate of Service**

I, Ryan Blaine Bennett, hereby certify that on August 26, 2013, I caused the foregoing *Notice of Videotaped Deposition of Gaurav Malhotra* to be filed and served via the Court's electronic case filing and noticing system to all parties registered to receive electronic notices in this matter and via electronic mail to the parties set forth in **Exhibit 2**, attached hereto.

/s/ Ryan Blaine Bennett

Ryan Blaine Bennett

## **EXHIBIT 2**

### **Service List**

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<i>Attorneys for the City of Detroit</i>	<p>David G. Heiman Heather Lennox JONES DAY North Point 901 Lakeside Avenue Cleveland, Ohio 44114 Telephone: (216) 586-3939 Facsimile: (216) 579-0212 dgheiman@jonesday.com hlennox@jonesday.com</p> <p>Bruce Bennett JONES DAY 555 South Flower Street Fiftieth Floor Los Angeles, California 90071 Telephone: (213) 243-2382 Facsimile: (213) 243-2539 bbennett@jonesday.com</p> <p>Thomas F. Cullen, Jr. (DC 224733) Gregory M. Shumaker (DC 416537) Geoffrey S. Stewart (DC 287979) JONES DAY 51 Louisiana Ave., N.W. Washington, D.C. 20001 Telephone: (202) 879-3939 Facsimile: (202) 626-1700 tfcullen@jonesday.com gshumaker@jonesday.com gstewart@jonesday.com</p>

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